

October 24, 2003

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AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Mr. George Zerniak
USEPA Region 5
77 West Jackson Blvd. AE-17J
Chicago, IL 60604-3507

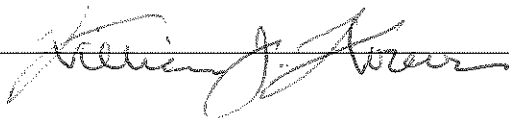
Subject: Exception Report for NESHAP, Ohio EPA ID P019 and L001

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 124.9 lb/month/sq ft surface area for the period of 07/01/2003 to 09/30/2003. The inherent reason for the exception was due to the unit developing a seal leak. To correct this, a new unit has been purchased and will be installed after the permit process is completed. The old unit was shut down at the end of July.

Ohio EPA ID# L001, a degreaser using perchloroethylene has exceeded the 30.6 lb/month/sq ft surface area limit with a 83.8 lb/month/sq ft surface area for the period of 07/01/2003 to 09/30/2003. The inherent reason for this exception was due to the unit developing a seal leak in the heating section. A new gasket and repair materials are being evaluated in order to correct this problem.

Sincerely,



William J. Hovevar, P.E.
Facility Manager

EDMS

Facility Name: **Morgan Electro Ceramics**
 Unit Name: **Finishing Equipment 6342**
 Company I.D.: **VPD-24**

EPA Facility ID: **1318031627**

Ohio EPA I.D.: **P019**

Month: **July**

Year: **2003**

Unit Information

Tank Length (inside): **2.92** (feet)
 Tank Width (inside): **1.50** (feet)
 Tank Surface Area (s.a.): **4.38** (feet)²

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Solvent Usage Information			Formulas / Notes
1	Type Solvent Used	Perchloroethylene	
2	S.G. of Solvent	1.62	[From MSDS]
3	Solvent Density	13.51 (lb/gallon)	[From MSDS]
4	Solvent Added	16.0 (gallon)	[From monthly log]
5	Waste Removed	0.0 (gallon)	[From monthly log]
6	% Solvent in waste	99.90% (%)	[From analytical report]
7	Solvent Removed in waste	0.0 (gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0 (gallon)	[From monthly log]
9	Total Solvent Removed	0.0 (gallon)	[7 + 8]
10	Total Solvent Emitted	16.0 (gallon)	[4 + 9]
11	Total Solvent Emitted	216.2 (lbs)	[10 * 3]

Monthly Emissions

Average Solvent Emission Rate: **49.4** (lb/month/ft² s.a.)
 Average Solvent Allowable Rate: **30.6** (lb/month/ft² s.a.)
 From 40 CFR 63, Subpart T

Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.

If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.

Three Month Rolling Average

3 - Month Average Solvent Emission Rate: **124.9** (lb/month/ft² s.a.)
 [Average of three previous months solvent emission rates]

Facility Name: **Morgan Electro Ceramics** EPA Facility ID: **1318031627**
Unit Name: **Finishing Equipment 6342**
Company I.D.: **VPD-24** Ohio EPA I.D.: **P019**

Month: **August** Year: **2003**

Unit Information

Tank Length (inside): **2.92** (feet)
Tank Width (inside): **1.50** (feet)
Tank Surface Area (s.a.): **4.38** (feet)²

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	0.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	0.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	0.0	(lbs)	[10 * 3]
Monthly Emissions				
Average Solvent Emission Rate:		0.0	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:		30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
<p>Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.</p> <p>If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.</p>				
Three Month Rolling Average				
3 - Month Average Solvent Emission Rate:		62.7	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates

Facility Name:	Morgan Electro Ceramics	EPA Facility ID:	1318031627
Unit Name:	Finishing Equipment 6342	Ohio EPA I.D.:	P019
Company I.D.:	VPD-24		
Month:	September	Year:	2003

Unit Information

Tank Length (inside):	2.92	(feet)
Tank Width (inside):	1.50	(feet)
Tank Surface Area (s.a.):	4.38	(feet) ²

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	0.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	0.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	0.0	(lbs)	[10 * 3]
Monthly Emissions				
Average Solvent Emission Rate:		0.0	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:		30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
<p>Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.</p> <p>If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.</p>				
Three Month Rolling Average				
3 - Month Average Solvent Emission Rate:		16.5	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates

Facility Name: **Morgan Electro Ceramics**
Unit Name: **Baron Blakeslee MLR-280LE**
Company I.D.: **VPD-34**

EPA Facility ID: **1318031627**
Ohio EPA I.D.: **L001**

Month: **July**

Year: **2003**

Unit Information

Tank Length (inside): **3.67** (feet)
Tank Width (inside): **2.67** (feet)
Tank Surface Area (s.a.): **9.79** (feet)²

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	41.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	41.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	553.9	(lbs)	[10 * 3]
Monthly Emissions				
Average Solvent Emission Rate:		56.6	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:		30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
<p>Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.</p> <p>If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.</p>				
Three Month Rolling Average				
3 - Month Average Solvent Emission Rate:		83.8	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates

Facility Name:	<i>Morgan Electro Ceramics</i>	EPA Facility ID:	<i>1318031627</i>
Unit Name:	<i>Baron Blakeslee MLR-280LE</i>	Ohio EPA I.D.:	<i>L001</i>
Company I.D.:	<i>VPD-34</i>		
Month:	<i>August</i>	Year:	<i>2003</i>

Unit Information

Tank Length (inside):	<i>3.67</i>	(feet)
Tank Width (inside):	<i>2.67</i>	(feet)
Tank Surface Area (s.a.):	<i>9.79</i>	(feet) ²

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	<i>Perchloroethylene</i>		
2	S.G. of Solvent	<i>1.62</i>		[From MSDS]
3	Solvent Density	<i>13.51</i>	(lb/gallon)	[From MSDS]
4	Solvent Added	<i>61.0</i>	(gallon)	[From monthly log]
5	Waste Removed	<i>32.0</i>	(gallon)	[From monthly log]
6	% Solvent in waste	<i>99.90%</i>	(%)	[From analytical report]
7	Solvent Removed in waste	<i>32.0</i>	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	<i>0.0</i>	(gallon)	[From monthly log]
9	Total Solvent Removed	<i>32.0</i>	(gallon)	[7 + 8]
10	Total Solvent Emitted	<i>29.0</i>	(gallon)	[4 + 9]
11	Total Solvent Emitted	<i>392.2</i>	(lbs)	[10 * 3]
Monthly Emissions				
Average Solvent Emission Rate:		<i>40.1</i>	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:		<i>30.6</i>	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
<p>Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.</p> <p>If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.</p>				
Three Month Rolling Average				
3 - Month Average Solvent Emission Rate:		<i>67.2</i>	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates

Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Baron Blakeslee MLR-280LE

Company I.D.:

VPD-34

Ohio EPA I.D.:

L001

Month:

September

Year:

2003

Unit Information

Tank Length (inside):

3.67

(feet)

Tank Width (inside):

2.67

(feet)

Tank Surface Area (s.a.):

9.79

(feet)²**Solvent Usage Information****Formulas / Notes**

1 Type Solvent Used

Perchloroethylene

2 S.G. of Solvent

1.62

[From MSDS]

3 Solvent Density

13.51

(lb/gallon)

[From MSDS]

4 Solvent Added

24.0

(gallon)

[From monthly log]

5 Waste Removed

0.0

(gallon)

[From monthly log]

6 % Solvent in waste

99.90%

(%)

[From analytical report]

7 Solvent Removed in waste

0.0

(gallon)

[gal. Waste] * [% solvent]

8 Pure Solvent Removed

0.0

(gallon)

[From monthly log]

9 Total Solvent Removed

0.0

(gallon)

[7 + 8]

10 Total Solvent Emitted

24.0

(gallon)

[4 + 9]

11 Total Solvent Emitted

324.3

(lbs)

[10 * 3]

Monthly Emissions

Average Solvent

Emission Rate:

33.1

(lb/month/

[11 / (tank surface area)]

Average Solvent

ft² s.a.)

Allowable Rate:

30.6

(lb/month/

From 40 CFR 63, Subpart T

ft² s.a.)**Note:** If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.**Three Month Rolling Average**

3 - Month Average Solvent

Emission Rate:

43.3

(lb/month/

[Average of three previous

ft² s.a.)

months solvent emission rates